

CORRES. CONTROL
OUTGOING LTR NO.

EG&G ROCKY FLATS

DOE ORDER#

93RF 13257

EG&G ROCKY FLATS, INC.
ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

DIST.	LTR	ENC
AMARAL, M.E.		
BENEDETTI, R.L.		
BENJAMIN, A.		
BERMAN, H.S.		
BRANCH, D.B.		
CARNIVAL, G.J.		
COPP, R.D.		
DAVIS, J.G.		
FERRERA, D.W.		
HANNI, B.J.		
HARMAN, L.K.		
HEALY, T.J.		
HEDAH, T.		
HILBIG, J.G.		
HUTCHINS, N.M.		
KIRBY, W.A.		
KUESTER, A.W.		
MAHAFFEY, J.W.		
MANN, H.P.		
MARX, G.E.		
MCDONALD, M.M.		
McKENNA, F.G.		
MONTROSE, J.K.		
MORGAN, R.V.		
POTTER, G.L.		
PIZZUTO, V.M.		
RISING, T.L.		
SANDLIN, N.B.		
SETLOCK, G.H.		
STEWART, D.L.		
SULLIVAN, M.T.		
SWANSON, E.R.		
WILKINSON, R.B.		
WILLIAMS, S.(ORC)		
WILSON, J.M.		
WYANT, R.D.		
Primrose, AL	✓	
Schubbe, DL	✓	
Busby, WS	✓	
Lake, DL	✓	
CORRES. CONTROL	X	X
ADMN RECORD/080/2	✓	
PATS/T130G		
TRAFFIC		

October 25, 1993

93-RF-13257

Richard J. Schassburger
Acting Director
Environmental Restoration Division
DOE, RFO

Attn: R. H. Blrk

RESPONSE TO COMMENTS AND ENVIRONMENTAL RESTORATION MANAGEMENT REVIEW -
WSB-432-93

This letter provides a formal response to the comments received from the Department of Energy (DOE), Headquarters (HQ) on the Operable Unit (OU) 16 Proposed Plan and serves as concurrence on the Plan by EG&G Rocky Flats Environmental Restoration (ER) Management.

Response to General Comments

1. The No Further Action alternative was selected based on all three criteria: verification of previous cleanup actions, natural degradation processes and the analysis of historical records.

A statement appears on page (p.) 1, paragraph (para.) 2, which reads: "This alternative is preferred because potential risks to human health and the environment have been reduced. Past cleanup actions or natural processes have eliminated the hazardous substances or the exposure pathways."

2. The following statements, including numerical data, will be added to the respective paragraphs on p. 4 under the heading, "Summary of Site Risks."

Individual Hazardous Substance Site (IHSS) 185 (insert as first sentence):
"The vapor pressure of TCA at 20 °C is 13.2 kPa (99mm of Hg; Mackay and Shiu, 1981), and volatilization is rapid (U.S. EPA, 1979). Also, TCA was not detected in any of the eight groundwater samples collected between November 1989 and April 1992 at monitoring well P218089."

IHSS 195 (insert as second sentence):
"Nickel can be released from buried nickel oxide to groundwater and soils by (1) dissolution of nickel oxide in water and (2) cation exchange between groundwater and the host soil or sediments. The rate of cation exchange is dependent on the cation exchange capacity of the surrounding soils or sediments and the availability of nickel in groundwaters. Nickel oxide, however is essentially insoluble. The equilibrium constant (K) for pure nickel oxide dissolution in water for the reaction:
 $\text{NiO(s)} \rightarrow \text{Ni}^{2+}(\text{aq}) + 0.5 \text{O}_2(\text{aq})$ is 10^{-35} , and the activity (effective concentration) of nickel

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IN REPLY TO RFP CC NO:

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☒ CLOSED

LTR APPROVALS:

ORIG & TYPIST INITIALS
CHH dg1

ADMIN RECORD

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Classification Office

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in aqueous solution resulting from nickel oxide dissolution will not be measurable by existing methods. For every gram (0.002 pound) of nickel oxide in contact with typical groundwater, approximately 10 micrograms (μg) of nickel per liter (L) of water is transferred to solution. EPA's reference dose for nickel oxide in drinking water is 100 $\mu\text{g/L}$ (U.S. EPA, 1990)."

Response to Specific Comments

1. The statement will be revised as follows: "In accordance with the Environmental Protection Agency Guidance (1989a), a no further action decision is appropriate at sites where a previous removal action or natural environmental processes mitigate risks to human health and the environment."

2. The first sentence will be amended to read: "...adjacent to the loading dock on November 10, 1986."

The second sentence will be revised as follows: "A commercial absorbent was used to clean up the spill at the time it occurred."

3. The sentence will be revised to read: "Because the spill occurred in a paved area and the cleanup response action of the source was immediate, the wind dispersion and infiltration transport pathways are eliminated."

A handwritten signature in dark ink, appearing to read "W. S. Busby" followed by a stylized flourish and the letters "WSB".

W. S. Busby
Acting Director
ERM/Remediation Project Management
EG&G Rocky Flats, Inc.

CHH:dql

Orig. and 1 cc - R. J. Schassburger